

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMAALONZO MOREFIELD, JR.,
PLAINTIFF,

VS -

KATHY HOLT,
DEFENDANT.

2:07CV80-MHT

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CIVIL ACTION NO. U.S.C. 1983

2007 JAN 29 A 10:10

TERA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALAMOTION FOR APPOINTMENT OF COUNSEL

PLAINTIFF, PRO SE, MOVES THIS COURT TO APPOINT COUNSEL TO REPRESENT PLAINTIFF IN THIS CIVIL ACTION STYLED HEREIN FOR THE FOLLOWING REASONS;

1. PLAINTIFFS CASE HAS MERIT AND WOULD BE BEST REPRESENTED BY A TRAINED, QUALIFIED LAWYER.
2. CASE REQUIRES EXTENSIVE DOCUMENTATION TO BE GATHERED, AND INVESTIGATION OF FACTS, DEPOSITIONS FROM PRISON OFFICIALS LOCATED OUTSIDE THE PRESENCE OF PLAINTIFF DUE TO INCARCERATION.
3. PROPERLY CROSS EXAMINE WITNESSES AND DISPUTE ISSUES AT ANY HEARING ON THIS CASE.
4. PLAINTIFF IS NOT A LAWYER AND PRESENTING CASE IN CHIEF WITHOUT PROPER LEGAL REPRESENTATION WILL BE DIFFICULT.
5. DUE TO COMPLEXITY AND DIFFICULTY OF CASE PERTAINING TO LEGAL ISSUES, LOCATING EXPERT WITNESSES, SUBPOENING MEDICAL RECORDS, INTERVIEWING WARDENS IS NOT WITHIN SCOPE OF PLAINTIFFS ABILITY.
6. CASE WILL BE TRIED BEFORE A JURY AND A LAWYER IS NEEDED FOR THAT PURPOSE.
7. COMPLEXITY IN APPLICATION OF EIGHTH AMENDMENT IN THIS CASE.

FOR CAUSE STATED HEREIN, PLAINTIFF ASK THIS COURT TO APPOINT COUNSEL FOR REPRESENTATION IN THIS CIVIL ACTION.

Respectfully Submitted,
ALONZO MOREFIELD, JR.,
PLAINTIFF, PRO SE.

by: A. Morefield